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U.S. COURTS

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CAMERON S. BURKE  
CLERK IDAHO

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF IDAHO

In Re	)	
	)	Case No. 96-02095
TERRY HIPWELL,	)	Chapter 12
	)	
	)	OBJECTION TO MOTION
	)	TO EXTEND TIME TO
Debtor.	)	FILE PLAN
_____	)	

Creditor John Deere Company ("John Deere"), by its undersigned counsel, objects to the Motion to Extend Time to File Plan submitted by the Debtor, on the grounds that the Debtor can be justly held accountable for his failure to file a plan within 90 days after the order for relief. These grounds are based upon the following facts and arguments:

1. The Debtor's position that he cannot determine the amount of the total payment within the plan until December 26, 1996, is unfounded. John Deere maintains that the Debtor, with due diligence, can obtain the information required to complete a plan within 90 days after the order for relief.

2. The requirement that a plan be filed within 90 days under § 1221 of the Bankruptcy Code was incorporated into § 1221 in order to prevent abuse of the bankruptcy system and the risk that collateral will deteriorate without the promise of a confirmable plan. The Debtor's request to extend the time for filing a plan runs counter to the legislative intent underlying the 90 day filing requirement and creates the likelihood that John Deere, which is

CERTIFICATE OF SERVICE

I certify that on November 15, 1996, I caused a true and correct copy of the foregoing document to be forwarded, by the method indicated below, to the following persons:

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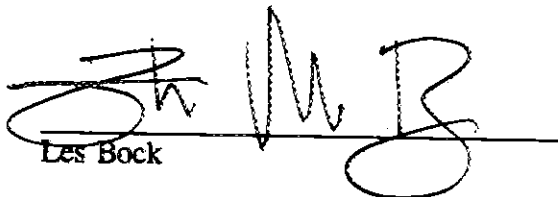
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Les Bock